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LETTER REGARDING U S EPA REGION III APPROVAL OF THE DRAFT TIER II SAMPLING  
AND ANALYSIS PLAN EXPANDED SITE INSPECTION FOR SITE 9 AREA OF CONCERN 1 ( AOC 1) AMMONIA SETTING PITS SUBAREA OF AREA OF CONCERN 6 (AOC 6) AND AREA  
OF CONCERN 7 (AOC 7) CHEATHAM ANNEX FISC WILLIAMSBURG VA

10/25/2013  
U S EPA REGION III



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029**

October 25, 2013

Mr. Scott Park  
NAVFAC MIDLANT, Building N-26, Room 3208  
Attention: Code OPHE3, Mr. Scott Park  
9742 Maryland Avenue  
Norfolk, VA 23511-3095

Subject: Draft Sampling and Analysis Plan, Expanded Site Inspection – Site 9, AOC 1, Ammonia  
Settling Pits Subarea of AOC 6, and AOC 7, Naval Weapons Station Yorktown  
Cheatham Annex, Williamsburg, Virginia, July 2013

Mr. Park:

Thank you for the opportunity to review the subject document. Attached are comments and observations on the document for your information. Since these comments don't impact the scope of the sampling plan, no response to comments is necessary. Please submit a final copy of the subject document for our records. If you have any questions, please contact me at 215-814-2077.

Sincerely,

A handwritten signature in blue ink, which appears to read "Gerald F. Hoover", is positioned above the typed name.

Gerald F. Hoover, RPM  
NPL/BRAC Federal Facilities Branch

cc: Wade Smith, VDEQ

Re: Draft Sampling and Analysis Plan, Expanded Site Inspection – Site 9, AOC 1, Ammonia Settling Pits Subarea of AOC 6, and AOC 7, Naval Weapons Station Yorktown  
Cheatham Annex, Williamsburg, Virginia, July 2013

### **GENERAL COMMENT**

In the fifth bullet on page 44 of the report, the second sentence should be clarified as follows:  
“The 95<sup>th</sup> percent UCL of the mean gw concentration from the wells located within the most contaminated portion of the gw plume (if a plume is identified) will be used as the exposure point concentration for the risk calculations.”

### **SITE 9**

According to page 30 of the report, the SI performed at this site revealed contamination in subsurface soil. However, throughout the report (pages 5, 20, and 43), only surface soil collection is proposed for the ESI. Did the SI for this site provide enough info about subsurface conditions that additional sampling is unnecessary? If so, justification should be presented in this report.

The answer to the first question appearing in Section 5.1.7 (page 31) discusses surface soil contamination and associated screening criteria exceedances observed during the SI. Page 30 of the report indicates that exceedances were also present in subsurface soil. This should be mentioned in Section 5.1.7.

### **AOC 1 – NORTH**

In the discussion of contaminant distribution at AOC 1 – North (page 33), surface soil contamination is discussed. What were the findings for subsurface soil during the SI? (This comment also applies to the first paragraph of Section 5.2.7.). If contaminants were present in subsurface soil in excess of screening criteria, then either additional sample collection should be considered for the ESI or justification should be provided for not doing so.

### **AOC 1 – SOUTH**

According to page 34, additional surface soil samples are recommended for the ESI to further define the extent of contamination. However, the Executive Summary and Section 4.2 of the report state that subsurface soil samples will also be collected. Please revise the text to accurately reflect proposed sample collection for the ESI.

### **AMMONIA SETTLING PITS (AOC 6)**

Section 5.3.3 (page 38) discusses surface soil contamination and associated screening criteria exceedances observed during the SI. Page 39 of the report indicates that exceedances were also present in subsurface soil. This should be mentioned in Section 5.3.3.

### **AOC 7**

In the discussion of AOC 7 on page 6 of the report (Executive Summary), the pending Removal Action to excavate soil should be mentioned.

Section 4.3 of the report should provide additional info on the pending Removal Action for soil, such as the anticipated date of this activity.